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CONSTITUTIONAL LAW—WOMEN AS JURORS—FOURTEENTH AMENDMENT.—The petitioner, a woman, applied for a writ of mandamus directing the proper officials to place women otherwise qualified on the jury list, maintaining that by their exclusion their privileges as citizens were abridged in violation of the Fourteenth Amendment. *Held*, no privilege was abridged, and the writ should not be granted. *In re Grilli* (Sup. Ct., Kings County, 1920) 179 N. Y. Supp. 795.

The privilege of serving as a juror is one which is guaranteed to citizens by the Fourteenth Amendment and cannot be abridged on account of color. *Ex parte Virginia* (1879) 100 U. S. 339. To withhold this privilege from citizens less than twenty-one years of age and more than seventy, as is commonly done, while technically an abridgment is justifiable. See *Strauder v. Virginia* (1879) 100 U. S. 303, 310; *Ex parte Virginia, supra*, at p. 365. The reasonableness of the restriction would seem to be the test. To exclude women wholly on account of sex, without motive of oppression, would not seem unreasonable in view of the acquiescence of half a century. Their enfranchisement has little bearing on this question since all voters have never been included in the jury lists.

CRIMINAL LAW—ESPIONAGE ACT—DEFAMING THE RED CROSS.—The defendant uttered false remarks derogatory to the Red Cross. *Held*, a violation of the Espionage Act, 40 Stat. 219, U. S. Comp. Stat. 1919, § 10212-O, prohibiting the utterance of false statements "with intent to interfere with the operation or success of the military or naval forces of the United States", since the statements, if believed, would undermine public confidence in the administration of the Red Cross and reduce its contributions. *Granzow v. United States* (C. C. A. 8th Cir. 1919) 261 Fed. 172.

The court in the instant case, while admitting the Red Cross itself not to be within the term "military or naval forces", as used in the statute, held that interference with the Red Cross was substantially hindering those military and naval forces. There is precedent, however, for holding the Red Cross to be included in the term "military or naval forces". *United States v. Nagler* (D. C. 1918) 252 Fed. 217. The charge to the jury, it is to be noted, should include an instruction as to the probable effect of the remarks as well as the intent with which they were uttered. *United States v. Schutte* (D. C. 1918) 252 Fed. 212. Such a result as that reached in the instant case is necessary in wartime and seems sound on legal principle. President Wilson on July 5, 1917 (General Order 82, Special Regulations No. 61), in accordance with authority vested in the President by Congress (1912), 37 Stat. 90, U. S. Comp. Stat. 1916, § 7705, accepted the services of the Red Cross, whose act of incorporation provides that it is to act "in accord with the military and naval authorities", (1905) 33 Stat. 600, U. S. Comp. Stat. 1916, § 7699, and submit annual reports to the Secretary of War. *Ibid.* § 6. Its members reporting for duty are subject to the military laws and regulations, as provided in Art. 10 of the International Red Cross Convention of 1906. General Order No. 170, War Dept. 1911, §§ 1, 5. That such an organization is one of the vital parts of the military and naval forces seems hardly questionable.

CRIMINAL LAW—LOTTERIES—MERCHANDISE VENDER.—The defendant used in his business a so-called merchandise vendor. By operating a lever the customer received a card marked "one collar button—5 cents",